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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA, SOUTHERN DIVISION**

YUICHI MIYAYAMA, an individual,

Plaintiff,

v.

STEVEN H. BURKE, as Executor of the Estate of
NORIKO HOSODA, *et al.*,

Defendants.

Case No. 2:20-cv-01683-DJA

**JOINT STIPULATED MOTION FOR
EXTENSION OF SCHEDULING
ORDER DATES
AND DRAFT ORDER
(Fourth Request)**

Pursuant to Local Rules IA 6-1 and 26-3, the Parties hereby jointly stipulate and move the Court for a brief extension of the sole remaining deadline set forth in the *Joint Stipulated Motion and Order for Extension of Deadline to Submit Rebuttal Disclosures and all Remaining Dates and Deadlines for Good Cause* (ECF No. 148) entered on July 7, 2023 (“Third Request”). This is the Parties’ fourth joint request and is made in good faith for the reasons set forth below. The Parties have completed discovery, and the Court has ruled on all dispositive motions (ECF No. 161).

Good cause exists for a short extension for the Parties to complete the only item remaining on the Court’s scheduling orders – that of the Parties’ submission of a Joint Pretrial Order. The Court recently granted the Motion to Withdraw filed by Janeen V. Isaacson and the law firm of Lipson Neilson, P.C. as counsel for Defendants Steven H. Burke and the Law Office of Steven H. Burke, LLC. In the wake of this development and taking into consideration any

scheduling conflicts with counsel and the Parties, the Parties request a brief one month extension to fulfill this last part of the Court's scheduling order. No trial date has yet been set by the Court, and no other deadlines will be impacted by this short extension.

Pursuant to Local Rule 26-3, the Parties provide the following information relative to the status of discovery and the proposed extension:

(a) *A statement specifying the discovery completed:* All discovery is completed in this matter.

(b) *A specific description of the discovery that remains to be completed:* No discovery remains to be completed.

(c) *The reason why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan:* For the reasons outlined above, although not discovery, the completion and submission of the Joint Pretrial Order cannot be completed by the May 10, 2024, date (30 days after the Court's decision on the dispositive motions).

(d) *A proposed schedule for completing all remaining discovery:* All discovery has been completed. The Joint Pretrial Order is the sole remaining item outlined in the *Joint Pretrial Order under the Joint Stipulated Motion and Order for Extension of Deadline to Submit Rebuttal Disclosures and all Remaining Dates and Deadlines for Good Cause (Third Request)* (ECF No. 148), which should be amended to reflect the following new due date:

1. Joint Pretrial Order: June 7, 2024

No other deadline need be altered.

For the reasons set forth above, good cause exists for the granting of this motion. This request is respectfully submitted on the grounds stated above.

1 Dated May 10, 2024

2 CHRISTIANSEN LAW, PLLC

3 /s/ Anthony W. Stirling, Esq.

4 Stephen K. Christiansen, Esq. #11081

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6 311 S. State, Ste. 250

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8 *Attorneys for Plaintiff*

LAW OFFICE OF STEVEN H. BURKE,
LLC

/s/ Steven H. Burke, Esq.

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Las Vegas, Nevada 89148

Attorney for Burke Defendants

[E-signature used with permission]

9 LAW OFFICES OF MONT E. TANNER

10 /s/ Monte E. Tanner, Esq.

11 Mont E. Tanner, Esq. #4433

12 2950 East Flamingo Road, Suite G

13 Las Vegas, Nevada 89121

14 *Attorney for Defendant Mont Tanner*

15 *[E-signature used with permission]*

16 IT IS SO ORDERED:

17 

18 DANIEL J. ALEREGTS

19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 5/14/2024